

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE

KYLE BURNS, RUBY HAYES, JASMINE  
NORVILLE, and LISA RODRIGUEZ, on  
behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

TD BANK, N.A.,

Defendant.

Civil Action No. 1:21-cv-18194-KMW-AMD

**NOTICE OF MOTION FOR  
PRO HAC VICE ADMISSION**

**Motion Date: March 21, 2022**

TO: ALL COUNSEL OF RECORD

**PLEASE TAKE NOTICE** that Defendant TD Bank, N.A. (“TD Bank”) will move before this Court at the Mitchell H. Cohen Building & U.S. Courthouse, 4<sup>th</sup> and Cooper Streets, Camden, NJ 08101, on March 21, 2022, for entry of an Order pursuant to Local Civil Rule 101.1(c) admitting as counsel pro hac vice in this matter Joshua D. Dunlap of the law firm of Pierce Atwood LLP.

**PLEASE TAKE FURTHER NOTICE** that TD Bank will rely upon the Certification of Joshua D. Dunlap, and the Certification of Susan M. Leming in support of the admission.

**PLEASE TAKE FURTHER NOTICE** that all Plaintiffs consent to the *pro hac vice* admission of Joshua D. Dunlap.

**PLEASE TAKE FURTHER NOTICE** that a Proposed Order granting *pro hac vice* admission to Joshua D. Dunlap is attached.

Dated: February 25, 2022

Respectfully submitted,  
**BROWN & CONNERY, LLP**

/s/ Susan M. Leming

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